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BY: SAM

To John Munn,

The problems on Pacific Lumber lands, and other timber lands have reached a point where they need a different approach to management. The ideology of the habitat conservation plan is outdated. The habitat remaining on Pacific Lumber property, is seriously degraded, and management plans should look towards rehabilitation and diversification. The habitat conservation plan encompasses procedures that should be required by law. Incidental Take Pennits, should not be exchanged for planned harvesting. Pacific lumber has already taken at least one owl nest, that is publicly known. The streams have been seriously affected by there logging practices. The fish, other aquatic life, and the streams need a time for recovery.

I have been working with Pacific Watershed Associates since January of 1998. I have covered many miles of roads on Pacific Lumber property. I worked in Bear Creek, Elk River, Jordan Creek, and Freshwater Creek. All these watersheds have different characteristics, and respond differently to human disturbances. Jordan and Bear Creek had numerous large landslides and torrents. The main stems of these streams have been filled with their deposits, destroying most of the riparian vegetation. I remember some large trees, but only in a few places, like along the 101.

In Elk River and Freshwater, I see a different problem. The terrain is not so steep, so tractors went everywhere. Multiple channels have been filled. If the streams have enough power, they have since eroded through these skids. If not, they remain subsurface, and are no longer considered streams. Another erosion process I have noticed, seems to relate to recent clearcutting. Small class 3 streams often begin to incise after clearcutting. I have seen healthy streams in old growth forest, where the banks are mossy, and fems cover the whole channel. After cutting, the banks of these streams are freshly eroded and have two to four feet of vertically downcut stream banks. This erosion is not attributable to roads, nor is it repairable. It is due to a change in the environment.

The Citizens Review Draft, Volume 1 of Pacific Lumbers Sustained Yield Plan and Habitar Conservation Plan, is quite informative. There are some steps toward a healthier environment, and there are a few things that concern me.

- 1. The summary itself states it has inadequate studies of redwood forest habitat, and that is the area of focus right now.
- 2. The plan calls for cutting 75% of the remaining old growth on their property. The majority of the area I've seen has been already harvested. Table 10 in the PALCO SYP/HCP shows and overall reduction in older seral types, and an increase in young forest and forest openings. That is exactly what is all ready happening, and it's not sustainable.
- 3. The buffer zones of class 1 and 2 streams should be extended further up slope, and no cutting should be allowed, within the zones. Class 3 streams and headwall swales, should be protected equally.
- 3. The boundary set for protection of an individual nesting site, outside the marbled murrelet protection zone, is not adequate. The only place I've seen the spotted owl is on Pacific Lumber land in the late seral or old growth seral type. While working on abandoned roads, a spotted owl flew down to watch us work. The first time I saw one I was surprised by its size. It was over a foot tall and quite plump. It flew freely in the spacious open area, under the canopy. It flew along with us for a while, watching us from the lower branches of the redwoods. It followed us, beyond the zone that would be protected in this plan. The thing that bothered me was the flagging for a truck road, right through the second growth grove, where the

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owl was. Pacific Lumber had the owl nest flagged out. This nest is in Freshwater, not the one that was taken, nor is it in headwaters, or within one of the other protected zones. I don't trust Pacific Lumber to leave these nests in peace.

5. Hardwoods will nearly be wiped out down to 68 acres, then recovery is assumed. The summary mentions hardwood domination, in areas. There are not many hardwoods remaining intermixed

in the older forest. There are huge slash piles of tan oak, and other hardwood species.

6. The vegetation remaining is selected, such as the redwoods, or invasive like blackberries, and pampas grass. The diversity is diminished further by the spraying of herbicides. How can the plan protect rare and endangered plants when they have already exterminated many of them? The forest floor is unsuitable in many places to walk through, even for wildlife, due to slash a few feet deep. The areas of desirable open understory are few. I have been in those areas. A few of them are in marbled Murrelet conservation areas.

7. We shouldn't have to pay such a high price for the exchange of Headwaters Forest, monetarily or economically.

8. A choice between Owl Creek and Grizzly Creek, is like choosing between two loved ones.

9. I know some people at Pacific Lumber are trying to improve their practices. The plan is a start in the right direction, because we are talking about the problems. However, I feel that Pacific Lumber should not be allowed an incidental take permit. They have already taken so much.

Please and work out a better solution, with more protection for the ecosystem. It's not just a Sincerely Yours, Marche/ Mannicka problem here. It's global. Thank You.

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